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6 Attorney for:
PHILLIP GORDON

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11
Plaintiff,
12
vs.
13 PHILLIP GORDON,
14
Defendant.

2:11-CR-258-KJD-PAL

UNOPPOSED MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE
AND PROPOSED ORDER

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16 COMES NOW, the defendant, PHILLIP GORDON, by and through his counsel,
17 Nisha Brooks-Whittington, Assistant Federal Public Defender, files this Unopposed Motion to
18 Modify Conditions of Pretrial Release to permit travel to San Diego , California, Saturday August 18,
19 2012 returning by midnight Sunday, August 19, 2012. This request is based upon the following
20 points and authorities.
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22 DATED this 17th day of August , 2012.

23 Respectfully Submitted,

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25 RENE L. VALLADARES
Federal Public Defender

26 /s/ Nisha Brooks-Whittington

27 NISHA BROOKS-WHITTINGTON
28 Assistant Federal Public Defender

POINTS AND AUTHORITIES

Mr. Phillip Gordon ("Mr. Gordon") was released on a Personal Recognizance Bond February 29, 2012 with Pretrial Release Conditions restricting him to travel within the state of Nevada. Since that time, he has remained in compliance with his pretrial release conditions. He plays for the Las Vegas Trojans football team and the team will be traveling to San Diego, California tomorrow for an out of town game.

Mr. Gordon respectfully requests this Court to modify the terms of his Pretrial Release to allow him to travel to San Diego, California Saturday, August 18, 2012, for the purpose of fulfilling his commitment and obligation to the team.

Mr. Gordon has demonstrated through his period of supervision with Pretrial Release and pre-trial services that he is capable of abiding by the law. Undersigned counsel spoke with Pretrial Services Officer, Samira Barlow and she indicated that Mr. Gordon is employed and complies with all of his conditions of release. Ms. Barlow does not oppose this request.

Undersigned counsel also contacted Assistant United States' Attorney, Phillip N. Smith Jr., who does not object to the requested modification.

CONCLUSION

For the reasons stated above, the undersigned respectfully requests that this Court allow Mr. Gordon to travel to San Diego, California and return the following day.

Respectfully submitted,

/s/ Nisha Brooks-Whittington

By: NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

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ORDER TO MODIFY CONDITIONS OF PRETRIAL RELEASE

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